

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:20CR228
	)	
Plaintiff,	)	JUDGE BENITA Y. PEARSON
	)	
v.	)	
	)	
WAYNE NORRIS,	)	<u>GOVERNMENT’S SUPPLMENTAL</u>
	)	<u>RESPONSE IN OPPOSITION TO</u>
Defendant.	)	<u>DEFENDANT’S MOTION TO REDUCE</u>
	)	<u>SENTENCE UNDER 18 U.S.C.</u>
	)	<u>§ 3582(c)(1)(A)(i)</u>

The United States of America, by and through undersigned counsel, respectfully submits the following Supplemental Response in Opposition to Defendant’s Motion to Reduce Sentence Under 18 U.S.C. 3582(c)(1)(A)(i). The Court should deny Defendant’s motion because the Defendant’s articulated reasons are not extraordinary and compelling reasons for his early release.

On February 22, 2021, the Defendant filed a *pro se* Motion for Compassionate Release. (R. 45: 3582 Motion). On March 1, 2021, the Government filed a Response in Opposition. (R. 46: Response). On April 27, 2021, after the Court appointed the Federal Public Defender’s Office, the Defendant filed a Supplemental Motion for Compassionate Release. (R. 50: Supplemental Motion).

In the Supplemental Motion, the Defendant again articulates that his medical conditions qualify as extraordinary and compelling reasons for his release. The United States previously submitted its argument contesting this request, stands by it now, and incorporates its argument for the purpose of this response.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

For the foregoing reasons, the United States asks that this Court deny Defendant's Motion to Reduce Sentence Under 18 U.S.C. § 3582(c)(1)(A)(i).

Respectfully submitted,

BRIDGET M. BRENNAN  
Acting United States Attorney

By: /s/ Kevin P. Pierce  
Kevin P. Pierce (PA: 312492)  
Assistant United States Attorney  
United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, OH 44113  
(216) 622-3758  
(216) 522-7499 (facsimile)  
Kevin.Pierce@usdoj.gov